

EXHIBIT A

In Re: City of Detroit, Debtor

*Howard Ryan
October 14, 2013*

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<p>1 Q. And by the vote, you're referring to the repeal of 2 PA 4?</p> <p>3 A. Yes.</p> <p>4 Q. 2011 PA 4?</p> <p>5 A. Yes.</p> <p>6 Q. I don't think I have anymore questions. Thank you, 7 Mr. Ryan.</p> <p>8 A. Thank you.</p> <p>9 MR. DONNELLY: Anybody on the phone with 10 questions? Anybody still on the phone?</p> <p>11 MS. BRUNO: Yeah, no questions.</p> <p>12 MR. DeCHIARA: No questions.</p> <p>13 MS. WALDRON: No questions.</p> <p>14 MR. MANSON: No questions.</p> <p>15 MR. DONNELLY: Do you have anymore 16 questions?</p> <p>17 MR. WERTHEIMER: Give me just a minute. 18 Let's just go off the record for a second.</p> <p>19 VIDEO TECHNICIAN: We're going off the 20 record at 9:58.</p> <p>21 (A pause was had in the proceedings.)</p> <p>22 VIDEO TECHNICIAN: We are going back on the 23 record at 9:59 a.m.</p> <p>24 RE-EXAMINATION</p> <p>25 BY MR. WERTHEIMER:</p>	<p>1 today as a 30(b)(6) witness you have not checked 2 with either the Governor or the State Treasurer or 3 any of their aides or agents to see whether any of 4 them had any conversations with the Legislative 5 Branch regarding Public Act 436?</p> <p>6 MR. DONNELLY: Well, I'm going to object to 7 the form of that question because you've been 8 produced documents and this witness has reviewed 9 documents that show communications between the 10 Governor's office and the Executive Branch, so 11 that's an unfair question. Did he beyond that --</p> <p>12 MR. WERTHEIMER: That's right.</p> <p>13 MR. DONNELLY: -- have conversations?</p> <p>14 MR. WERTHEIMER: No, that's fair.</p> <p>15 BY MR. WERTHEIMER:</p> <p>16 Q. Beyond reviewing those documents, you did not take 17 the next step and talk to either the Governor, the 18 State Treasurer or any of either of their aides or 19 agents to determine whether any of them had 20 communicated with the Legislative Branch relative to 21 436, did you?</p> <p>22 MR. DONNELLY: Well, I'm going to object to 23 the form of that question because it 24 mischaracterizes his earlier testimony because it's 25 compound, and if you want to break it down between</p>
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<p>1 Q. I'd just like to ask a follow-up to a question 2 counsel asked you. You said that the appropriation 3 language was put in the -- early on in the process; 4 is that correct?</p> <p>5 A. Yes.</p> <p>6 Q. Based on your conversations with the people at the 7 time, was it your understanding that one or more of 8 the reasons to put the appropriation language in 9 there was to make sure that it could not -- the new 10 act could not be defeated by a referendum?</p> <p>11 A. Yes.</p> <p>12 Q. And where did you get that knowledge from?</p> <p>13 A. Well, having watched the entire process unfold over 14 the past two years.</p> <p>15 Q. The Governor's office knew that that was the point 16 of it?</p> <p>17 A. Yes.</p> <p>18 Q. That your department knew that that was the point of 19 it?</p> <p>20 A. Yes.</p> <p>21 Q. The legislators you were dealing with knew that that 22 was the point of it?</p> <p>23 A. Yes.</p> <p>24 Q. Okay. And I don't want to raise any hackles, but I 25 want to make sure I understand that in testifying</p>	<p>1 the Governor and the Treasurer --</p> <p>2 MR. WERTHEIMER: Fine. I'll break it down.</p> <p>3 MR. DONNELLY: -- because he had different 4 testimony with regard to the Treasury and the 5 Governor.</p> <p>6 BY MR. WERTHEIMER:</p> <p>7 Q. Fair enough. I'll break it down, just so the record 8 is clear.</p> <p>9 In preparing as a 30(b)(6) witness, which 10 you did, correct?</p> <p>11 A. Yes.</p> <p>12 Q. Okay. You did not talk to either the Governor or 13 any of his aides to determine whether any of them 14 had communicated with the Legislature about what 15 became 436, did you?</p> <p>16 MR. DONNELLY: Beyond the caveat that we 17 had in terms of reviewing documents --</p> <p>18 MR. WERTHEIMER: Yes.</p> <p>19 MR. DONNELLY: -- that show those 20 communications.</p> <p>21 MR. WERTHEIMER: Yes, beyond that.</p> <p>22 MR. DONNELLY: Beyond the emails and beyond 23 all those paper communications, no.</p> <p>24 BY MR. WERTHEIMER:</p> <p>25 Q. You didn't talk to any of those folks and say did</p>